

EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

BRUCE CRAIGIE and
BARBARA CRAIGIE,

Case No. 1:15-cv-00441

Plaintiffs,

Hon. Janet T. Neff

v.

NATIONSTAR MORTGAGE, LLC,
a limited liability company, and
JOHN DOES 1-5,

Defendants.

Theodore J. Westbrook (P70834)
Amanda P. Narvaes (P74957)
DREW, COOPER & ANDING, P.C.
Attorneys for Plaintiffs
Aldrich Place, Suite 200
80 Ottawa Avenue NW
Grand Rapids, MI 49503
(616) 454-8300

Elisa J. Lintemuth (P74498)
DYKEMA GOSSETT PLLC
Attorneys for Defendant
Nationstar Mortgage, LLC
300 Ottawa Avenue NW
Grand Rapids, MI 49503
(616) 776-7500

PLAINTIFFS' FIRST SET OF DISCOVERY REQUESTS TO DEFENDANT
NATIONSTAR MORTGAGE, LLC

Plaintiffs Bruce and Barbara Craigie, by and through their attorneys, Drew, Cooper & Anding, P.C., request that Defendant Nationstar Mortgage, LLC ("Nationstar") provide responses to the following Requests for Admission, Interrogatories and Requests for Production of Documents within 30 days pursuant to Federal Rules of Civil Procedure 26, 33, 34 and 36.

DEFINITIONS AND INSTRUCTIONS

Unless otherwise stated, the following are applicable to all Requests for Production of Documents, Interrogatories and Requests for Admission:

A. “You” and “Your” shall mean Nationstar and the agents, employees and attorneys, past and present, of Nationstar.

B. The term “Document” as used herein is intended to have the broadest possible definition under Federal Rule of Civil Procedure 34 and should be read to include, but not be limited to: all writings or visible images of any kind, whether in final or draft form, now or at any time in Your possession, custody or control, and including all copies of each document if the copies contain any additional writing or are not identical copies of the original. The term “Document” includes, but is not limited to, letters, invoices, contracts, agreements, receipts, correspondence, electronic mail, memoranda, notes, photographs, diary and calendar entries, records of meetings, minutes or statistical compilations, statements, tape or other audio recordings, summaries or records of telephone calls, summaries or records of meetings or conferences, summaries or records of personal conversations or interviews, records of other conversations or communications, reports, computer programs, electronic data compilations and electronic files.

C. The term “Identify,” when used in reference to documents, means to state the following with respect to each document: (1) its date; (2) the identity of the person(s) who authored it; (3) the identity of the person(s) to whom it was addressed and who are known or believed to have received copies of it; (4) the form of the document (that is, letter, memorandum, invoice, etc.); (5) its title; (6) its length (in number of pages); (7) the identity of the person(s)

whom you know of believe to have a copy or draft of the document; and (8) a description of the subject matter of the document.

D. The term “Lake Drive” shall refer to 1625 Lake Drive, East Grand Rapids, Michigan.

E. The term “Scenic Drive” shall refer to 2985 Scenic Drive, Fruitland Township, Michigan.

F. The term “Modification Requests” shall mean any request or attempt by the Plaintiffs or their agents to secure a modification of either of the Mortgage Loans.

G. The term “Mortgage Loan(s)” shall refer to the Mortgages, Notes and related closing Documents executed in April, 2006 for refinancing of the Lake Drive and the Scenic Drive properties.

H. The term “Foreclosures” shall refer to the process, including procedures leading up to, and following the completion of the sheriff’s sales of the Lake Drive and the Scenic Drive properties.

I. If You decline to answer any Request for Production of Documents on the grounds of burdensomeness, identify the number and nature of documents needed to be searched, the location of the documents, and the number of person hours and costs required to conduct a search of the documents.

J. If You claim a privilege not to answer any Request for Production of Documents, Request for Admission, or Interrogatory, You should identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for such claim.

REQUESTS FOR ADMISSION

1. Admit that from August 25, 2011 through the present, Nationstar has not been licensed to collect consumer debts in the State of Michigan.

ADMIT OR DENY:

2. Admit that during the period from August 25, 2011 through the present, Nationstar regularly collected consumer debts in the State of Michigan on behalf of the owners of such debt.

ADMIT OR DENY:

3. Admit that Nationstar was a “debt collector” as that term is used in the Fair Debt Collection Practices Act when Nationstar obtained servicing rights to defaulted home mortgage loans and attempted to collect debts in connection with such loans.

ADMIT OR DENY:

4. Admit that Nationstar regularly attempts to collect consumer debts in the State of Michigan.

ADMIT OR DENY:

5. Admit that Nationstar provided Plaintiffs no notice of a sheriff’s sale specifying that a sheriff’s sale would take place on April 2, 2014.

ADMIT OR DENY:

6. Admit that Plaintiffs had requested a modification of the Lake Drive Mortgage Loan as of February 21, 2014.

ADMIT OR DENY:

7. Admit that Nationstar received from Plaintiffs some or all requested documents in connection with a modification of the Lake Drive Mortgage Loan on March 7, 2014.

ADMIT OR DENY:

8. Admit that on April 2, 2014, Nationstar sold the Lake Drive property at a sheriff's sale.

ADMIT OR DENY:

9. Admit that as of April 2, 2014, Nationstar had not informed Plaintiffs of any result regarding their pending request to modify the Lake Drive Mortgage Loan.

ADMIT OR DENY:

10. Admit that subsequent to April 2, 2014, Nationstar communicated to Plaintiffs that it would consider a request to modify the Lake Drive Mortgage Loan.

ADMIT OR DENY:

11. Admit that subsequent to April 2, 2014, Nationstar did not consider a request to modify the Lake Drive Mortgage Loan.

ADMIT OR DENY:

INTERROGATORIES

1. To the extent your answer to any of the foregoing Requests for Admission is anything other than an unqualified admission, explain in detail the basis for your denial or failure to admit and Identify any documents which support your denial or failure to admit.

RESPONSE:

2. List each instance of contact between Nationstar and Bruce or Barbara Craigie, and state the following: (1) the type of contact (e.g., telephone, email, letter, fax, statement); (2) the date of contact; (3) if a fax, email or telephone contact, the time of the contact; (4) the party initiating the contact; (5) the name and title of the contact person; and (6) a brief description of the content of the contact.

RESPONSE:

3. List each instance of contact between Nationstar and any third party other than its present counsel of record, and state the following: (1) the type of contact (e.g., telephone, email, letter, fax, statement); (2) the date of contact; (3) if a fax, email or telephone contact, the time of the contact; (4) the party initiating the contact; (5) the name and title of the contact person; (6) the purpose for the contact; and (7) a brief description of the content of the contact, where such contact referenced or related in any way to any Modification Requests, either or both Foreclosures, the servicing of either Mortgage Loan, or either or both Plaintiffs.

RESPONSE:

4. Identify by name, title, job responsibility, job duty location, last known address and last known phone number, each Nationstar employee who: (1) had contact with either Plaintiff in connection with the Mortgage Loans; (2) had responsibility for the Mortgage Loan files; (3) had involvement in the receipt, handling, processing and/or decision-making regarding Plaintiffs' Modification Requests; (4) had involvement in the handling, processing and/or decision-making regarding either or both Foreclosures; or (5) had responsibility for review of Nationstar's files regarding the Mortgage Loans and/or the Plaintiffs.

RESPONSE:

5. Identify by name, company (if applicable), title, address, phone number, and relationship with Nationstar, each agent of Nationstar, other than direct Nationstar employees, who had involvement in the receipt, handling, processing and/or decision-making regarding Plaintiffs' Modification Requests; had involvement in the handling, processing and/or decision-making regarding either or both Foreclosures; had responsibility for review of Nationstar's files regarding the Mortgage Loans and/or the Plaintiffs; or had involvement in any sale or attempted sale of the Lake Drive property, including the completed sale to Ryan G. Dykstra.

RESPONSE:

6. Identify by full name and business address Nationstar's providers of the following services for the years 2011-2014: (1) telephone; and (2) email.

RESPONSE:

7. Identify by company name and business address each entity which currently possesses any of the original Mortgage Loan documents, including the mortgages, the notes and any and all closing documents relating to the Mortgage Loans.

RESPONSE:

8. Identify by caption name, case number, court and filing year each lawsuit filed between 2013 and the present in which Nationstar is or has been a defendant.

RESPONSE:

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce any and all documents identified in your answers to the foregoing Requests for Admission and Interrogatories.

RESPONSE:

2. Produce the original Mortgage Loan documents, including the Mortgages, the Notes and any and all closing documents relating to the Mortgage Loans.

RESPONSE:

3. Produce any and all documents comprising credit files, loan files, file jackets and/or any other collections of documents relating specifically to: (1) any and all mortgage loan(s) or account(s) of Bruce Craigie; and (2) any and all of the following properties:

- a. 1625 Lake Drive SE, East Grand Rapids, MI 49506 (loan number: 0596863530);
- b. 553 Wealthy Street SE, Grand Rapids, MI 49503 (loan number: 0057306821);

- c. 545 Madison Avenue SE, Grand Rapids, MI 49503 (loan number: 0058068362);
- d. 223 Morris Avenue SE, Grand Rapids, MI 49503 (loan number: 0057307050);
- and
- e. 2985 Scenic Drive, Muskegon, MI 49445 (loan number: 0596863531).

RESPONSE:

- 4. Produce any and all documents relating in any way to any Modification Requests.

RESPONSE:

5. Produce any and all documents relating in any way to either or both of the Foreclosures, including but not limited to any and all documents evidencing, referencing or relating to any notice of sheriff's sale, postponement of sheriff's sale or rescission of sheriff's sale.

RESPONSE:

6. Produce any and all documents received by Nationstar from the Consumer Financial Protection Bureau in connection with: (1) Barbara Craigie, Bruce Craigie and/or any mortgage loan associated with Plaintiffs; and (2) complaints by any other borrower against whom Nationstar instituted or carried out foreclosure proceedings during the pendency of a modification request.

RESPONSE:

7. Produce any and all correspondence, including email correspondence, with or regarding Plaintiffs.

RESPONSE:

8. Produce any and all correspondence, including email correspondence, regarding either or both of the Foreclosures and/or either or both of the Mortgage Loans.

RESPONSE:

9. Produce any and all servicing agreements regarding the Mortgage Loans.

RESPONSE:

10. Produce any and all credit bureau reports regarding either or both Plaintiffs.

RESPONSE:

11. Produce any and all documents regarding the creditworthiness of either or both Plaintiffs.

RESPONSE:

12. Produce any and all documents referencing or relating to the sale of the Lake Drive property to Ryan G. Dykstra.

RESPONSE:

13. Produce any and all documents referencing or relating to any attempted or contemplated sale of the Lake Drive property via auction.

RESPONSE:

14. Produce any and all documents which comprise or relate to Nationstar's policies and/or procedures, in place during the years 2011-2014, for processing mortgage loan modification requests.

RESPONSE:

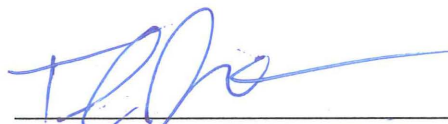
15. Produce any and all documents which comprise or relate to Nationstar's policies and/or procedures, in place during the years 2011-2014, for handling mortgage loan foreclosures, including but not limited to such policies and/or procedures regarding handling sheriff's sales.

RESPONSE:

16. Produce any and all agreements, in place during the years 2011-2014, between Nationstar and any of the following: (1) First Horizon Home Loans; (2) First Tennessee National Bank; (3) First Horizon National Corporation; and (4) Bank of New York Mellon Corporation, trustee.

RESPONSE:

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'TJ Westbrook', is written over a horizontal line.

Theodore J. Westbrook (P70834)
DREW, COOPER & ANDING, P.C.

Dated: August 11, 2015

Attorneys for Plaintiffs
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BARBARA CRAIGIE,

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NATIONSTAR MORTGAGE, LLC,
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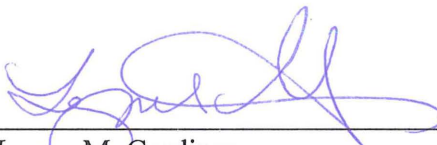
PROOF OF SERVICE

Defendants.

STATE OF MICHIGAN)
 :ss
COUNTY OF K E N T)


I, Lynne M. Gardiner, state that I am an employee in the law firm of DREW, COOPER & ANDING, and that on **August 11, 2015**, I served a copy of **Plaintiffs' First Set of Discovery Requests to Defendant Nationstar Mortgage, LLC** via Email and First Class mail, postage fully prepaid thereon, upon the following:

Elisa J. Lintemuth
DYKEMA GOSSETT PLLC
300 Ottawa Avenue, N.W., Suite 700
Grand Rapids, MI 49503
Attorneys for Defendant Nationstar



Lynne M. Gardiner

Subscribed and sworn to before me on August 11, 2015.



Stacey P. Bybee, Notary Public
Ottawa County, Michigan
My Commission Expires: 02/15/2019
Acting in Kent County, Michigan